

#### Office of Sponsored Programs Procedure 10004 Awards Transfer Between Associates Revision Date: 08/11/2015

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#### 1. Introduction

**Responsible Officials:** Director Post Award as applicable **Effective Date:** July 21, 2003 **Revision Date:** August 15, 2015

**IMPORTANT:** For federal awards/subawards issued to Virginia Tech with a start date prior to December 26, 2014, 2 CFR Part 215 (OMB Circular A-110) and 2 CFR, Part 220 (OMB Circular A-21) apply. For all new funds (new awards and new monies, such as continuation awards, supplements, etc. received for existing awards) with a start date on or after December 26, 2014, these new funds are subject to <u>2 CFR Part 200</u> (commonly referred to as Uniform Guidance—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) but hereinafter referred to as "<u>2 CFR Part 200</u>").

Due to the change in federal regulations the language in this procedure specific to the new regulations, <u>2 CFR Part 200</u>, is highlighted in red font below.

#### 2. Scope

This procedure outlines the requirements necessary to shift or transfer an award from one Office of Sponsored Programs (OSP) staff member to another. The procedure applies to all OSP staff members that are involved in the administration or use of sponsored award funds.

### 3. Procedure Statement

OSP functions as the steward of Virginia Tech's research portfolio and is responsible for ensuring that all research proposals and awards comply with university, federal, and sponsor regulations, policies, and procedures. As such, proper oversight between various OSP staff members is critical. This procedure outlines the award transfer process to assure consistent tracking and review are maintained for an award.

### 4. Reason for the Procedure

The reason for this procedure is to inform the community of the requirements associated with procedures regarding the transfer of award assignments between associates that will ensure full

understanding of the transferred responsibility by both associates and management. Periodically it becomes necessary for awards be transferred between associates for the purpose of individual workload alignment or other purposes. These transfers are to be initiated only upon approval of the various team directors over the involved associates and should result in minimal impact to the effective administration of awards involved in the transfer. The decision to transfer awards will be documented to ensure that all parties to the transfer understand their newly-assigned responsibilities.

# 5. Definitions

**OSP Award File –** The paper award file including any related sub-folder. The particular sub-folder used is dependent upon internal process manuals.

**OSP Official Electronic File** – The electronic file is a mechanism for storage of electronic documents regarding awards associated with Virginia Tech sponsored research. This repository may change its format as technology changes, but the duty of organization, maintenance, upkeep and implementation resides with OSP.

**Sponsored Program Award** – Legally, sponsored program awards (often referred to as awards) are liabilities of the university. They represent the consequence of a bona fide offer (the proposal) extended to and accepted by an outside entity (the sponsor). Awards typically come in the form of grants, cooperative agreements, and contracts.

- A grant is a funding instrument through which the sponsor is a patron of the project.
- A cooperative agreement implies substantive mutual interaction between the sponsor and the award recipient.
- A contract is the vehicle for procurement of property or services (e.g., drug development, research and development services, evaluation, training, etc.).

OSP accepts sponsor funds on behalf of the university and the researcher. Until the OSP completes the necessary administrative tasks (negotiating awards, establishing the project account, and reporting the award to the university's board of trustees), the award is not legally accepted and costs may not be incurred.

# 6. Post Award Transfers

- a) When proposing a transfer of awards, the Post Award Associate (POA) will provide the Senior Director, Post Award, or designated supervisor, with a plan for the transfer to provide minimal disruption in the daily administration and demonstrating that the individual assignments are fully understood.
- b) Transfers will normally be made in logically-related blocks of effort (e.g., a group of sponsors, a university department, etc.).
- c) The Director will evaluate and approve the documentation of the transfer prior to its initiation.

- d) The Director will assure the transferring POA is held responsible for transferring any information or copies of any files not held in the OSP Official Electronic File. Any pending communication needed or scheduled with the sponsor or other university associate should also be communicated by the transferring POA to the receiving POA. If any collaborative effort is underway with Pre Award or Contracts, the Director will assure the transferring POA passes along said information to the receiving POA and other directly involved OSP staff are notified of the change as well as appropriate. The Director may handle the transfer or assign the transfer to a supervisor.
- e) The receiving POA is responsible for the review of each transferred award to ensure a complete understanding of the history and the present status of the award.
- f) The receiving POA will identify any problem on an award prior to accepting the award for administration. Identified problems should be discussed with the Director (unless instructed otherwise) for resolution.

### 7. References

• <u>2 CFR Part 200</u>, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)

### 8. Contacts

- Director of Pre Award Office of Sponsored Programs North End Center, Suite 4200 300 Turner Street NW Blacksburg, VA 24061 540.231.8054
- Senior Director of Post Award 540.231.9372
- Assistant Vice President for Sponsored Programs 540.231.5281

### 9. Roles and Responsibilities

- Director of Pre Award and Senior Director of Post Award:
  - Approve and assure transfers are accomplished smoothly.
  - Assure transferring POA gathers all related award information and communicates or passes along said information to receiving POA.
- Receiving POA:
  - Assure information received on transferred award(s) is properly reviewed and understood.
  - Discuss any issues with director.
- Transferring POA:
  - Assure information transferred on transferred award(s) is complete and includes all related electronic and non-electronic files.

Discuss any issues with director.

# 10. Dissemination

This procedure may be posted on a Virginia Tech internet accessible site. No public restrictions are noted.

# 11. Approval and Revisions

This procedure was approved originally on July 21, 2003 by the Director, Office of Sponsored Programs.

Revision approved March 15, 2016 by the Assistant Vice President for Sponsored Programs. This major revision updates the formatting of the procedure, brings the procedure into compliance with <u>2</u> <u>CFR Part 200</u>, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) and other minor edits for title changes and clarity.

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